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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

11 William Algeo IV Weed,  
12 Plaintiff,  
13  
14 vs.  
15 Equifax Information Service  
16 Defendants

Case No.: 2:24-cv-01560-GMN-MDC

## **DISCOVERY PLAN AND PROPOSED SCHEDULING ORDER**

SUBMITTED IN COMPLIANCE WITH LR 26-1(b)

Plaintiff WILLIAM ALGEO IV WEED and Defendant EQUIFAX INFORMATION SERVICES, LLC, by and through their counsel of record, hereby submit their stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure 16 and 26, as well as LR 16-1 and 26-1.

25 It is hereby requested that the Court enter the following discovery plan and  
26 scheduling order:  
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1           **1. Discovery Plan:**

|   |  |
|---|--|
| 3           Discovery Cut-Off                                   | 4 <b>05/01/2025</b> (180 days from the date<br>Defendant filed its Answer) |
| 5           Deadline to Amend Pleadings                         | 6 <b>02/01/2025</b> (90 days prior to the close of<br>discovery)           |
| 7           Deadline to Disclose Initial Expert<br>Disclosures  | 8 <b>03/03/2025</b> (60 days prior to<br>the close of discovery)           |
| 9           Deadline to Disclose Rebuttal Expert<br>Disclosures | 10 <b>04/03/2025</b> (30 days after<br>the Initial Disclosure of Experts)  |
| 11          Deadline to File Dispositive Motions                | 12 <b>06/02/2025</b> (30 days after the close of<br>discovery)             |

13           **3. Pre-Trial Order:** The parties shall file a joint pretrial order no later than

14          **7/02/2025** or thirty (30) days after the date set for filing dispositive motions. In the  
15          event that parties file dispositive motions, the date for filing the joint pretrial order  
16          shall be suspended until thirty (30) days after decision on the dispositive motions or  
17          further order of the Court.

18           **4. Extensions or Modifications of the Discovery Plan and Scheduling**

19           **Order:** Applications to extend any date set by the discovery plan, scheduling order,  
20          or other order must comply with the Local Rules.

21           **5. Initial Disclosures:** The parties shall make initial disclosures on or before

22          **February 3, 2025.** Any party seeking damages shall comply Federal Rules of Civil  
23          Procedure 26(a)(1)(A)(iii).

1           **6. Protective Order:** The parties may seek to enter a stipulated protective order  
2 pursuant to Rule 26(c) prior to producing any confidential documents. Any such  
3 stipulated protective order will be sought no later than **February 14, 2025.**  
4

5           **7. Electronic Service:** The parties agree that pursuant to Rules 5(b)(2)(E) and  
6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be  
7 served by sending such documents by email.  
8

9           **8. Alternative Dispute Resolution Certification:** The parties certify that they  
10 met and conferred about the possibility of using alternative dispute-resolution  
11 processes including mediation, arbitration, early neutral evaluation. The parties have  
12 not reached any stipulations at this stage.  
13

14           **9. Alternative Forms of Case Disposition Certification:** The parties certify  
15 that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c)  
16 and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-  
17 01). The parties have not reached any stipulations at this stage.  
18

20           **10. Electronically Stored Evidence.**  
21

22           The parties have discussed the retention and production of electronic data. The  
23 parties agree that service of discovery by electronic means, including sending original  
24 electronic files by email or on a CD is sufficient. The parties reserve the right to revisit  
25 this issue if a dispute or need arises.  
26

1                   **11. Electronic Evidence Conference Certification:** The parties further intend  
2 to present evidence in electronic format to jurors for the purposes of jury deliberations  
3 at trial. The parties discussed the presentation of evidence for juror deliberations but  
4 did not reach any stipulations as to the method at this early stage.  
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8 Dated January 8, 2025

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| 9 <u>/s/ Ari H. Marcus</u><br>10                  Ari H. Marcus, Esq.<br>11                  MARCUS & ZELMAN, LLC<br>12                  701 Cookman Avenue, Suite 300<br>13                  Asbury Park, New Jersey 07712<br>14                  (845) 367-7146<br>15                  ari@marcuszelman.com<br>16                  PRO HAC VICE<br>17                  Attorney for Plaintiff | 18 <u>/s/ Gia Marina</u><br>19                  Gia Marina, Esq.<br>20                  CLARK HILL PLC<br>21                  1700 South Pavilion Center Drive<br>22                  Suite 500<br>23                  Las Vegas, NV 89135<br>24                  (702) 862-8300<br>25                  gmarina@clarkhill.com<br>26                  Attorney for Defendant<br>27                  Equifax Information Services, LLC |
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## **SCHEDULING ORDER**

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

## IT IS SO ORDERED

Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge

Dated: 1/10/2025